

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JACOB MATHLEY

No. 20 CR 585

Magistrate Judge Maria Valdez

**MOTION FOR ENTRY OF UNOPPOSED  
PROTECTIVE ORDER GOVERNING DISCOVERY**

Pursuant to Fed. R. Crim. P. 16(d) and 18 U.S.C. § 3771(a), the United States of America, by JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, moves for the entry of an unopposed protective order, and in support thereof states as follows:

1. The complaint in this case charges defendant with possession of child pornography, in violation of Title 18, United States Code, Section 2252A(a)(5)(B).
2. There is no district judge assigned to the case yet as the deadline for indictment has been extended to November 2, 2020. Nevertheless, the government would like to produce early discovery to defense counsel.
3. The discovery to be provided by the government in this case includes sensitive information, whose unrestricted dissemination could adversely affect law enforcement interests and the privacy interests of third parties.
4. The government has discussed the proposed protective order with counsel for defendant, who does not oppose the entry of the proposed order.

WHEREFORE, the government respectfully moves this Court to enter the proposed protective order.

Respectfully submitted,

JOHN R. LAUSCH, JR.  
United States Attorney

By: /s/ Angel M. Krull  
ANGEL M. KRULL  
Assistant U.S. Attorney  
219 South Dearborn St., Rm. 500  
Chicago, Illinois 60604  
(312) 399-9915

Dated: October 6, 2020